

DRAFT PERMIT #71374

PLACE ID #2094

PERMITTEE:	Printpack Inc.
FACILITY:	Prescott Valley Facility
PERMIT TYPE	Class I Air Quality Permit
DATE ISSUED:	tbd
EXPIRY DATE:	tbd

SUMMARY

This Class I air quality permit is issued to Printpack, Inc., the Permittee, for the continued operation of a flexographic printing and converting facility. The facility is located at 6800 E. 2nd St., Prescott Valley, Yavapai County, AZ, 86314. Place I.D. 2094. This is a new Class I Permit, No. 71374, which supersedes Class II Synthetic Minor Permit No. 59842.

The Permittee is expanding the operation with a resultant potential to emit (PTE) of volatile organic compounds (VOC) greater than the Class II limit of 100 tons per year. Thus a Class I permit, (including a facility-wide VOC limit to stay below the 250 tons per year Major New Source Review threshold) is required.

This permit is issued in accordance with Arizona Revised Statutes (ARS) 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the Code of Federal Regulations (CFR), except as otherwise defined in this permit.

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Table of Contents

ATTACHMENT “A”: GENERAL PROVISIONS.....	4
I. PERMIT EXPIRATION AND RENEWAL	4
II. COMPLIANCE WITH PERMIT CONDITIONS.....	4
III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE.....	4
IV. POSTING OF PERMIT	5
V. FEE PAYMENT	5
VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE	5
VII. COMPLIANCE CERTIFICATION	6
VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS	7
IX. INSPECTION AND ENTRY	7
X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD	7
XI. ACCIDENTAL RELEASE PROGRAM	7
XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING	7
XIII. RECORDKEEPING REQUIREMENTS	13
XIV. REPORTING REQUIREMENTS.....	14
XV. DUTY TO PROVIDE INFORMATION	14
XVI. PERMIT AMENDMENT OR REVISION	14
XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION.....	15
XVIII. TESTING REQUIREMENTS	16
XIX. PROPERTY RIGHTS	18
XX. SEVERABILITY CLAUSE.....	18
XXI. PERMIT SHIELD	19
XXII. PROTECTION OF STRATOSPHERIC OZONE.....	19
XXIII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS	19
ATTACHMENT “B”: SPECIFIC CONDITIONS	20
I. FACILITY-WIDE REQUIREMENTS	20
II. ALTERNATE OPERATING SCENARIO USING LOW VOC MATERIALS	26
III. VOC CAPTURE AND CONTROL	27
IV. SOLVENT STILL AND STORAGE TANKS 4 AND 5	35
V. PARTICULATE MATTER AND OPACITY	35
VI. FUGITIVE DUST REQUIREMENTS	37
VII. OTHER PERIODIC ACTIVITIES	39
ATTACHMENT “C”: EQUIPMENT LIST	43

ATTACHMENT “A”: GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

- A.** This permit is valid for a period of five (5) years from the date of issuance.
[ARS § 49-426.F, A.A.C. R18-2-306.A.1]
- B.** The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[ARS § 49-426.F, A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

- A.** The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
[A.A.C. R18-2-306.A.8.a]
- B.** It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
[A.A.C. R18-2-306.A.8.b]

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

- A.** The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]
- B.** The permit shall be reopened and revised under any of the following circumstances:
1. Additional applicable requirements under the Clean Air Act become applicable to the Class I source. Such a reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to A.A.C. R18-2-322.B. Any permit revision required pursuant to this subparagraph shall comply with the provisions in A.A.C. R18-2-322 for permit renewal and shall reset the five-year permit term;
[A.A.C. R18-2-321.A.1.a]
 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by

the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit;

[A.A.C. R18-2-321.A.1.b]

3. The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; and

[A.A.C. R18-2-321.A.1.c]

4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

[A.A.C. R18-2-321.A.1.d]

- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall, except for reopenings under Condition III.B.1, affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition III.B.1 above shall not result in a resetting of the five-year permit term.

[A.A.C. R18-2-321.A.2]

IV. POSTING OF PERMIT

- A. The Permittee shall post this permit or a certificate of permit issuance at the facility in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

1. Current permit number; or
2. Serial number or other equipment identification number (equipment ID number) that is also listed in the permit to identify that piece of equipment.

[A.A.C. R18-2-315.A]

- B. A copy of the complete permit shall be kept on site.

[A.A.C. R18-2-315.B]

V. FEE PAYMENT

- A. The Permittee shall pay fees to the Director pursuant to ARS § 49-426(E) and A.A.C. R18-2-326.

[A.A.C. R18-2-306.A.9 and -326]

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

- A. The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety (90) days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.

[A.A.C. R18-2-327.A]

- B.** The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.B.

[A.A.C. R18-2-327.B]

VII. COMPLIANCE CERTIFICATION

- A.** The Permittee shall submit a compliance certification to the Director semiannually, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than May 15th, and shall report the compliance status of the source during the period between October 1st of the previous year and March 31st of the current year. The second certification shall be submitted no later than November 15th, and shall report the compliance status of the source during the period between April 1st and September 30th of the current year.

[A.A.C. R18-2-309.2.a]

- B.** The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;

[A.A.C. R18-2-309.2.c.i]

2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period,

[A.A.C. R18-2-309.2.c.ii]

3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in Condition VII.B.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;

[A.A.C. R18-2-309.2.c.iii]

4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;

[A.A.C. R18-2-309.2.c.iii]

5. All instances of deviations from permit requirements reported pursuant to Condition XII.B; and

6. Other facts the Director may require to determine the compliance status of the source.

[A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

- C.** A copy of all compliance certifications shall also be submitted to the EPA Administrator.

- D.** If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above.

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[A.A.C. R18-2-304.I]

IX. INSPECTION AND ENTRY

A. Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

B. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

[A.A.C. R18-2-309.4.a]

C. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

[A.A.C. R18-2-309.4.b]

D. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

[A.A.C. R18-2-309.4.c]

E. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

[A.A.C. R18-2-309.4.d]

F. Record any inspection by use of written, electronic, magnetic and photographic media.

[A.A.C. R18-2-309.4.e]

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

[A.A.C. R18-2-304.D.3]

XI. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

[40 CFR Part 68]

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

[A.A.C. R18-2-310.01.A, B, and C]

1. Excess emissions shall be reported as follows:

-
- a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:
- (1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.
 - (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a(1) above.
[A.A.C. R18-2-310.01.A]
- b. The report shall contain the following information:
- (1) Identity of each stack or other emission point where the excess emissions occurred;
[A.A.C. R18-2-310.01.B.1]
 - (2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
[A.A.C. R18-2-310.01.B.2]
 - (3) Date, time and duration, or expected duration, of the excess emissions;
[A.A.C. R18-2-310.01.B.3]
 - (4) Identity of the equipment from which the excess emissions emanated;
[A.A.C. R18-2-310.01.B.4]
 - (5) Nature and cause of such emissions;
[A.A.C. R18-2-310.01.B.5]
 - (6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
[A.A.C. R18-2-310.01.B.6]
 - (7) Steps taken to limit the excess emissions; and
[A.A.C. R18-2-310.01.B.7]
 - (8) If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.
[A.A.C. R18-2-310.01.B.8]
2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after

excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XII.A.1 above.

[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with A.A.C. R18-2-310.01.A is prompt for deviations that constitute excess emissions;
[A.A.C. R18-2-306.A.5.b.i]
2. Notice regarding upset conditions, which are defined as malfunctions or breakdowns of pollution control equipment, continuous emissions monitoring systems (CEMS), or continuous opacity monitoring systems (COMS) that are submitted within two working days of discovery shall be considered prompt; and
[A.A.C. R18-2-306.A.5.b.ii]
3. Except as provided in Conditions XII.B.1 and 2, prompt notification of all other types of deviations shall be every 6-months, concurrent with the semi-annual compliance certifications required in Condition VII, and can be submitted on the annual/semiannual deviation monitoring report form located on the Arizona Department of Environmental Quality Website.

[A.A.C. R18-2-306.A.5.a]

C. Emergency Provision

1. An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[A.A.C. R18-2-306.E.1]
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XII.C.3 is met.
[A.A.C. R18-2-306.E.2]
3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

[A.A.C. R18-2-306.E.3]

- a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

[A.A.C. R18-2-306.E.3.a]

- b. The permitted facility was being properly operated at the time of the emergency;

[A.A.C. R18-2-306.E.3.b]

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

[A.A.C. R18-2-306.E.3.c]

- d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

[A.A.C. R18-2-306.E.3.d]

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

[A.A.C. R18-2-306.E.4]

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[A.A.C. R18-2-306.E.5]

D. Compliance Schedule

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

[ARS § 49-426.I.3]

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

1. Applicability

A.A.C. R18-2-310 establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;

[A.A.C. R18-2-310.A.1]

- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;

[A.A.C. R18-2-310.A.2]

- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
[A.A.C. R18-2-310.A.3]
- d. Contained in A.A.C. R18-2-715.F; or
[A.A.C. R18-2-310.A.4]
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.
[A.A.C. R18-2-310.A.5]

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.B]

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
[A.A.C. R18-2-310.B.1]
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.B.2]
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
[A.A.C. R18-2-310.B.3]
- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
[A.A.C. R18-2-310.B.4]
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
[A.A.C. R18-2-310.B.5]
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
[A.A.C. R18-2-310.B.6]

- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
[A.A.C. R18-2-310.B.7]
- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
[A.A.C. R18-2-310.B.8]
- i. All emissions monitoring systems were kept in operation if at all practicable; and
[A.A.C. R18-2-310.B.9]
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.
[A.A.C. R18-2-310.B.10]

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.E.3.b, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:
[A.A.C. R18-2-310.C.1]
 - (1) The excess emissions could not have been prevented through careful and prudent planning and design;
[A.A.C. R18-2-310.C.1.a]
 - (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
[A.A.C. R18-2-310.C.1.b]
 - (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.C.1.c]
 - (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
[A.A.C. R18-2-310.C.1.d]

- (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
[A.A.C. R18-2-310.C.1.e]
- (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
[A.A.C. R18-2-310.C.1.f]
- (7) All emissions monitoring systems were kept in operation if at all practicable; and
[A.A.C. R18-2-310.C.1.g]
- (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.
[A.A.C. R18-2-310.C.1.h]
- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.E.2 above.
[A.A.C. R18-2-310.C.2]
- 4. Affirmative Defense for Malfunctions during Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.E.2.
[A.A.C. R18-2-310.D]
- 5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.
[A.A.C. R18-2-310.E]

XIII. RECORDKEEPING REQUIREMENTS

- A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:
[A.A.C. R18-2-306.A.4.a]
 - 1. The date, place as defined in the permit, and time of sampling or measurements;
[A.A.C. R18-2-306.A.4.a.i]
 - 2. The date(s) any analyses were performed;
[A.A.C. R18-2-306.A.4.a.ii]
 - 3. The name of the company or entity that performed the analyses;
[A.A.C. R18-2-306.A.4.a.iii]

4. A description of the analytical techniques or methods used;
[A.A.C. R18-2-306.A.4.a.iv]
 5. The results of analyses; and
[A.A.C. R18-2-306.A.4.a.v]
 6. The operating conditions as existing at the time of sampling or measurement.
[A.A.C. R18-2-306.A.4.a.vi]
- B.** The Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[A.A.C. R18-2-306.A.4.b]

XIV. REPORTING REQUIREMENTS

- A.** The Permittee shall submit the following reports:
- B.** Compliance certifications in accordance with Condition VII.
[A.A.C. R18-2-306.A.5.a]
- C.** Excess emission; permit deviation, and emergency reports in accordance with Condition XII.
[A.A.C. R18-2-306.A.5.b]
- D.** Other reports required by any condition of Attachment “B”.

XV. DUTY TO PROVIDE INFORMATION

- A.** The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
[A.A.C. R18-2-304.G and -306.A.8.e]
- B.** If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[A.A.C. R18-2-304.H]

XVI. PERMIT AMENDMENT OR REVISION

The Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Condition XVII, as follows:

- A. Administrative Permit Amendment (A.A.C. R18-2-318);
[A.A.C. R18-2-318]
- B. Minor Permit Revision (A.A.C. R18-2-319); and
[A.A.C. R18-2-319]
- C. Significant Permit Revision (A.A.C. R18-2-320)
[A.A.C. R18-2-320]
- D. The applicability and requirements for such action are defined in the above referenced regulations.

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

- A. The Permittee may make changes at the permitted source without a permit revision if all of the following apply:
[A.A.C. R18-2-317]
 - 1. The changes are not modifications under any provision of Title I of the Act or under ARS § 49-401.01(24);
[A.A.C. R18-2-317.A.1]
 - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
[A.A.C. R18-2-317.A.2]
 - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
[A.A.C. R18-2-317.A.3]
 - 4. The changes satisfy all requirements for a minor permit revision under A.A.C. R18-2-319.A;
[A.A.C. R18-2-317.A.4]
 - 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements; and
[A.A.C. R18-2-317.A.5]
 - 6. The changes do not constitute a minor NSR modification.
[A.A.C. R18-2-317.A.6]
- B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of Conditions XVII.A and XVII.C of this Attachment.
[A.A.C. R18-2-317.B]
- C. For each change under Conditions XVII.A and XVII.B above, a written notice by certified mail or hand delivery shall be received by the Director and the Administrator a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment,

may be provided less than 7 working days in advance of the change, but must be provided as far in advance of the change, as possible or, if advance notification is not practicable, as soon after the change as possible.

[A.A.C. R18-2-317.D]

D. Each notification shall include:

1. When the proposed change will occur;

[A.A.C. R18-2-317.E.1]

2. A description of the change;

[A.A.C. R18-2-317.E.2]

3. Any change in emissions of regulated air pollutants; and

[A.A.C. R18-2-317.E.3]

4. Any permit term or condition that is no longer applicable as a result of the change.

[A.A.C. R18-2-317.E.7]

E. The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section.

[A.A.C. R18-2-317.F]

F. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under A.A.C. R18-2-306.A.11 shall not require any prior notice under this Section.

[A.A.C. R18-2-317.G]

G. Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this Section over the term of the permit, do not satisfy Condition XVII.A above.

[A.A.C. R18-2-317.H]

XVIII. TESTING REQUIREMENTS

[A.A.C. R18-2-312]

A. The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

B. Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

C. Performance Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

D. Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

1. Test duration;
2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

E. Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 63, shall be submitted to the Director within 60 days after the test is performed. A written report of the results of all other performance tests shall be submitted within 30 days after the test is performed, or as otherwise provided in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

H. Extension of Performance Test Deadline

[A.A.C. R18-2-312.J]

For performance testing required under Condition XVIII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:

[A.A.C. R18-2-312.J]

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.

[A.A.C. R18-2-312.J.1]

2. The Permittee shall provide to the Director a written description of the force majeure event and a rationale for attributing the delay in testing beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.

[A.A.C. R18-2-312.J.2]

3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the Director. The Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.

[A.A.C. R18-2-312.J.3]

4. Until an extension of the performance test deadline has been approved by the Director under subsections Conditions XVIII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Condition XVII of Attachment A.

[A.A.C. R18-2-312.J.4]

5. For purposes of Condition XVIII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.

[A.A.C. R18-2-312.J.1]

XIX. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

[A.A.C. R18-2-306.A.8.d]

XX. SEVERABILITY CLAUSE

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

[A.A.C. R18-2-306.A.7]

XXI. PERMIT SHIELD

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions pursuant to Condition XVI.B of this Attachment and any facility changes without a permit revision pursuant to Condition XVII of this Attachment.

[A.A.C. R18-2-317.F, - 320, and -325]

XXII. PROTECTION OF STRATOSPHERIC OZONE

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

[40 CFR Part 82]

XXIII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulations.

[40 CFR Part 60 and Part 63]

ATTACHMENT "B": SPECIFIC CONDITIONS

I. FACILITY-WIDE REQUIREMENTS

A. Opacity

1. Instantaneous Surveys and Six-Minute Observations

a. Instantaneous Surveys

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.A.1.a(1) and (2).

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

[A.A.C. R18-2-311.b]

(2) EPA Reference Method 9 Certified Observer.

[A.A.C. R18-2-306.A.3.c]

b. Six-Minute Observations

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.A.1.b(1) and (2).

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

[A.A.C. R18-2-311.b]

(2) EPA Reference Method 9.

c. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all 6-minute Method 9 observations required by this permit are conducted as a 6-minute Alternative Method-082 (Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted as an instantaneous Alt-082 camera survey. Any 6-minute Method 9 observation required by this permit can be conducted as a 6-minute Alternative Method-082 and any

instantaneous visual survey required by this permit can be conducted as an instantaneous Alt-082 camera survey.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring, Recordkeeping, and Reporting Requirements

- a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.
- b. If the plume on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.
- c. If the plume on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the plume.
 - (1) If the six-minute observation of the plume is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.
 - (2) If the six-minute observation of the plume is greater than the applicable opacity standard, then the Permittee shall do the following:
 - (a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;
 - (b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken; and
 - (c) Report the event as an excess emission for opacity in accordance with Condition XII.A of Attachment "A".
 - (d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

[A.A.C. R18-2-306.A.3.c]

B. General Requirements for Compliance Assurance Monitoring (CAM)

The following requirements shall be applicable to any equipment that is subject to CAM requirements:

1. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall

conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emission points are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

2. Response to excursions

- a. Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emission point (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable, but no later than 24 hours following detection of an excursion, in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction, and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action, or any necessary follow-up actions to return operations to within the indicator range, designated condition, or below applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)(1)]

- b. Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation, and maintenance procedures and records, and inspection of the control device, associated capture system, and process.

[40 CFR 64.7(d)(2)]

3. If the Permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the Department, and if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conduction monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

4. Excursions shall be reported as required by Condition VII.B.4 of Attachment “A” of this permit. The compliance certification shall include, at a minimum, the following:

[A.A.C. R18-2-309(2)(c)(iii)]

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursion or exceedances, as applicable, and the corrective actions taken; and
[40 CFR 64.9(a) (2)(i)]
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable)
[40 CFR 64.9(a) (2)(ii)]

C. Operational Limitations and Standards

1. Operation and Maintenance

The Permittee shall operate all equipment identified in Attachment “C” in accordance with vendor-supplied operations and maintenance instructions. If vendor-supplied operations and maintenance instructions are not available, the Permittee shall prepare an Operation and Maintenance Plan, which provides adequate information to properly operate and maintain the equipment in good working order. In the absence of vendor-supplied operations and maintenance instructions, the Permittee shall operate the equipment in accordance with the Operation and Maintenance Plan.

[A.A.C. R18-2-306.A.2]

2. Emission Limits/Standards

- a. The Permittee shall not discharge or cause to be discharged into the atmosphere from the facility volatile organic compound (VOC) emissions that exceed 225 tons per year, based on a 12-month rolling total.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

- b. The Permittee shall use less than 9 tons of any individual federal hazardous air pollutant (HAP), and less than 22.5 tons of any combination of HAP based on a 12-month rolling total.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

- c. The Permittee shall not operate emission units Press 04, Press 05 or Laminator AL-32 prior to the installation and operation of RTO-I02 to control VOC emissions from each emission unit respectively.

[A.A.C. R18-2-306.01 & -331.A.3.e]

[Material Permit Condition identified by italics and underline]

- d. The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under their control in such quantities or concentrations as to cause air pollution.
[A.A.C. R18-2-730.D]
- e. The Permittee shall not process, store, use, or transport materials including solvents or other volatile compounds in such a manner and by such means that they will evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.
[A.A.C. R18-2-730.F]
- f. Where a stack, vent, or other outlet is at such a level that odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the Permittee to a degree that will adequately dilute, reduce, or eliminate the discharge of air pollution into adjoining property.
[A.A.C. R18-2-730.G]

3. Monitoring, Recordkeeping, and Reporting Requirements

a. Operations and Maintenance

The Permittee shall maintain, on-site, records of the manufacturer's specifications or Operation and Maintenance Plan for minimizing emissions for all process and control equipment listed in Attachment "C".

[A.A.C. R18-2-306.A.4]

b. VOC Emissions Monitoring, Recordkeeping, and Reporting

[A.A.C. R18-2-306 A.3.c]

- (1) The Permittee shall keep records of purchase orders, invoices, and either certified product data sheets or manufacturer formulation data sheets for all VOC containing materials.
- (2) The Permittee shall maintain a monthly accounting of all VOC containing ink, coating, adhesive and solvent materials used individually in each of the following: Presses 01, 02, 03, 04 and 05, Outboard Coater OP-03, Extruder/Laminator EL-31, Laminator/Coater AL-32, all Parts and Plate Washers, as well as ink preparation, cleanup and other associated support operations. Supporting records used to develop the accounting, including purchase orders, invoices, production usage logs and safety data sheets (SDS) necessary to verify the type and amount of each material used, shall be maintained on site and shall be readily available to ADEQ upon request.
- (3) The Permittee shall process the monthly accounting of VOC containing material usage, described in Condition I.C.3.b(2) through the materials management database to convert the data to VOC total emissions, taking into account the status of each

emission unit, process or activity as uncaptured or captured, controlled or uncontrolled and the respective control efficiency for controlled emissions.

- (a) The Permittee shall use as the respective control efficiency, 95% for I01 and 97.5% for I02, or the control efficiency documented in the most recent performance test results approved by ADEQ.
- (b) The Permittee shall include emissions from solvent storage tanks ST-01 through ST-05 in the monthly accounting of emissions
- (4) Each month the Permittee shall record a total of VOC emissions, in tons per month (tpm).
- (5) The total monthly VOC emissions shall be added to the total monthly VOC emissions for each of the previous consecutive 11 calendar months to establish the 12-month rolling total emissions for the facility. This rolling 12-month VOC emissions total shall be used to determine compliance with the emission limit specified in Condition I.C.2.a

c. HAP Emissions Monitoring, Recordkeeping, and Reporting

[A.A.C. R18-2-306.A.3.c]

- (1) The Permittee shall keep records of purchase orders, invoices, and either certified product data sheets or manufacturer formulation data sheets for all HAP-containing materials.
- (2) Monthly usage of all HAP-containing materials shall be recorded. Based on the HAP content in each material, the monthly total of HAP consumed shall be calculated and recorded.
- (3) At the end of each month, the Permittee shall calculate the rolling 12-month totals of all HAP consumed to show compliance with Condition I.C.2.b.

4. Permit Shield

[A.A.C. R18-2-325]

Compliance with the conditions of this Part shall be deemed compliance with A.A.C R18-2-730.D, F, and G.

D. National Emission Standards for Hazardous Air Pollutants

- 1. The existing facility, at which wide-web flexographic printing presses are operated, is subject to the provisions of 40 CFR 63 Subpart KK-National Emission Standards for the Printing and Publishing Industry. Compliance with the requirements of Conditions I.C.2.b of Attachment "B" of this permit establish the

facility to be an area source with respect to 40 CFR 63 Subpart KK and thus the Permittee is only subject to certain recordkeeping and notification requirements of Subpart KK.

[40 CFR 63.820(a)(2) and (3)]

2. Compliance with Condition I.C.3.c of Attachment "B" of this permit meet the applicable recordkeeping requirements of 40 CFR 63.829(d).

[40 CFR 63.829(d)]

3. Compliance with Condition XVI of Attachment "A" of this permit meet the applicable notification requirements of 40 CFR 63.830(b)(1).

[40 CFR 63.830(b)(1)]

II. ALTERNATE OPERATING SCENARIO USING LOW VOC MATERIALS

A. Applicability

This Section is applicable to Laminator AL-32 when operated under Alternate Operating Scenario 1 (AOS-1), which is defined as operating with water-based, or other coating formulations that contain no more than 1% VOC by weight.

B. Operational Limits

1. The Permittee may direct exhaust emissions from AL-32 to atmosphere only when operating with water-based, or other coating formulations that contain no more than 1% VOC by weight.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

2. All operations of AL-32 other than AOS-1 are subject to the Conditions of Section III of this Attachment.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

3. The exhaust ductwork of AL-32 shall be equipped with sensors, controls and interlocks to prevent the diversion of exhaust to atmosphere any time the concentration of VOC in the exhaust stream is greater than 5% of the lower explosion limit of propane.

[A.A.C. R18-2-306.A.2 & -331.A.3.c]

[Material Permit Condition identified by italics and underline]

C. Monitoring, Recordkeeping, and Reporting Requirements

1. The Permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a damper position indicator at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.

[A.A.C. R18-2-306.01 & -331.A.3.a]

[Material Permit Condition identified by italics and underline]

2. The Permittee shall at all times the process is operating, continuously monitor as practicable, and record, electronically, or by chart recorder, whether the flow is

directed to the control device or diverted to atmosphere. This record shall be maintained on site and readily available to ADEQ upon request.

[A.A.C. R18-2-306.A.4]

3. The Permittee shall contemporaneously with making the change from one operating scenario to another, record in a log or other electronic means a record of the scenario under which it is operating. This log shall be maintained on site and readily available to ADEQ upon request.

[A.A.C. R18-2-306.A.4 & -A.11.a]

III. VOC CAPTURE AND CONTROL

A. Applicability

1. This Section is applicable to Presses 01, -02, -03, -04 and -05, coaters associated with Presses 01, -02, and -03, Coater OP-03 the press room total enclosure, the equipment enclosures for Press 04 and 05, Parts Washers PW-01, PW-02 and PW-03, Plate Washer PW-04, the Solvent Distillation Tank, Solvent Storage Tanks ST-04 and ST-05 and the associated ink, solvent and adhesive material handling support operations at the facility.
2. This Section is applicable to Laminator AL-32 and the equipment enclosures for Laminator AL-32, except when operating under AOS-1 per the requirements of Section II of this Attachment.
3. This Section is applicable to Catalytic Oxidizer IO1 and Regenerative Thermal Oxidizer IO2.

B. Air Pollution Control Requirements

1. The Permittee shall maintain and operate VOC capture systems in accordance with manufacturer's specifications and consistent with good air pollution control practice to capture 100% of VOC emissions from the equipment and processes identified in Conditions III.A.1 and III.A.2 at all times when VOC containing materials are being processed, including associated and support material handling and cleaning operations.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

2. The Permittee shall maintain and operate thermal oxidizers (IO1 and IO2) in accordance with manufacturer's specifications and consistent with good air pollution control practice to control emissions from the equipment and processes identified in Conditions III.A.1 and III.A.2. at all times when VOC containing materials are being processed, including associated and support material handling and cleaning operations. The Permittee shall make the manufacturer's specifications available to ADEQ upon request.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

3. Presses 01, -02, -03, -04 and -05, associated coaters and Laminator AL-32 shall each have an interlock device to prevent their operation unless the thermal

oxidizer temperature to which the emissions are routed has reached the minimum operating temperature and minimum pressure specified in Conditions III.B.5.b(1) or III.B.5.c(1) and Conditions III.B.5.b(2) and III.B.5.c(2) as appropriate.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

4. The exhaust ductwork of AL-32 shall be equipped with sensors, controls and interlocks to prevent the diversion of exhaust to atmosphere any time the concentration of VOC in the exhaust stream is greater than 5% of the lower explosion limit of propane.

[A.A.C. R18-2-306.A.2 & -.331.A.3.c]

[Material Permit Condition identified by italics and underline]

5. Thermal Oxidizing Control Devices

- a. At all times VOC emissions from the equipment and processes identified in Conditions III.A.1 and III.A.2 shall be routed to either Catalytic Oxidizer (I01) or Regenerative Thermal Oxidizer (I02).

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

b. Catalytic Oxidizer (I01)

- (1) The Permittee shall maintain the average catalyst bed temperature reported from the most recent performance test results approved by ADEQ as the minimum average temperature for normal operation of the catalytic oxidizer.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (2) The Permittee shall maintain the differential pressure between the press room total enclosure and the maintenance department at a minimum negative value of -0.007 inches of water.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (3) The catalytic oxidizer shall have a minimum VOC destruction efficiency of 95 percent.

[A.A.C. R 18-2-306.01.A and -.331.A.3.a]

[Material Permit Condition identified by italics and underline]

c. Regenerative Thermal Oxidizer (I02)

- (1) The Permittee shall maintain the average combustion chamber temperature reported from the most recent performance test results approved by ADEQ as the minimum average temperature for normal operation of the RTO. Prior to obtaining results from the initial performance test, the Permittee shall maintain 1500°F as the minimum average combustion chamber temperature.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (2) The Permittee shall maintain the average static pressure in the final trunk line inlet duct prior to the regenerative thermal oxidizer blower, at a pressure no less negative than that specified based upon final system design. The Permittee shall assure the static pressure specified by final system design will maintain a minimum negative pressure of -0.007 inches of water at each permanent enclosure under all representative operating conditions. Prior to placing the RTO in operation as a control device, the Permittee shall provide notification to the Director of the static pressure specified by final system design.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

- (3) The regenerative thermal oxidizer shall have a minimum VOC destruction efficiency of 97.5 percent.

[A.A.C. R18-2-306.A.2 and -.331.A.3.e]

[Material Permit Condition identified by italics and underline]

6. Permanent Total Enclosures (PTE)

a. This Section is applicable to:

- (1) The Press Room PTE,
- (2) Each material handling area PTE for Press 4 and 5, and
- (3) Each material handling area PTE for Laminator/Coater AL-32.

b. The Permittee shall ensure that each PTE conforms to the following 4-point criteria:

[A.A.C. R 18-2-306.A.2]

- (1) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
- (2) The total area of all NDO's shall not exceed 5 percent of the surface area of enclosure's four walls, floor, and ceiling.
- (3) The average facial velocity of air through all NDO's shall be at least 3600 m/hr (200 fpm). The direction of airflow through all NDO's shall be into the enclosure.
- (4) All access doors and windows whose areas are not included in Condition III.B.6.b(2) and are not included in the calculation of Condition III.B.6.b(3) shall be closed during routine operation of the process.

C. Monitoring, Recordkeeping, and Reporting Requirements

1. Catalytic Oxidizer (I01)

- a. The Permittee shall validate the catalyst bed temperature sensor as per the manufacturer's guidelines, at a minimum frequency of once per year.
[A.A.C. R 18-2-306.A.2 and -331.A.3.c]
[Material Permit Condition identified by italics and underline]
- b. The Permittee shall record the temperature of the catalyst bed every fifteen minutes on a temperature chart or on an electronic data logger. For each hour the catalytic oxidizer is in operation to control VOC emissions, the Permittee shall record four readings. The average temperature shall be calculated as a 3 hour rolling average.
[A.A.C. R 18-2-306.A.3.c]
- c. The Permittee shall perform vibration analysis on the forced draft fan/motor in compliance with the Operation and Maintenance Plan. In case the vibration analysis shows higher than normal range, appropriate corrective action shall be implemented to bring down the vibration levels to the normal range. Additionally any corrective action taken shall be documented.
[A.A.C. R 18-2-306.A.2 and 306.A.3.c]
- d. The Permittee shall conduct the following annually:
 - (1) Visually inspect the level of catalyst media in each bed in relation to its pre-marked full level. If catalyst level is low, it shall be made up by addition of new catalyst;
 - (2) Check for cracks or physical damage to catalyst beds or chamber;
 - (3) Gently rake and smooth each bed to reorient catalyst without damaging the catalyst; and
 - (4) Inspect proper placing of the bed top screens.
[A.A.C. R 18-2-306.A.2]
- e. The Permittee shall maintain a log and submit a report on the activities listed in Condition III.C.1 along with the next compliance certification report.
[A.A.C. R 18-2-306.A.5.a]

2. Regenerative Thermal Oxidizer (I02)

- a. The Permittee shall validate the combustion chamber temperature sensor as per the manufacturer's guidelines, at a minimum frequency of once per year.
[A.A.C. R 18-2-306.A.2 and -331.A.3.c]
[Material Permit Condition identified by italics and underline]
- b. The Permittee shall record the temperature of the combustion chamber every fifteen minutes on a temperature chart or on an electronic data logger. For each hour the regenerative thermal oxidizer is in operation to

control VOC emissions, the Permittee shall record four readings. The average temperature shall be calculated as a 3 hour rolling average.

[A.A.C. R 18-2-306.A.3.c]

- c. The Permittee shall take corrective action following the discovery of any abnormal operation of RTO-I02 or the combustion chamber temperature monitoring system as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

[A.A.C. R18-2-306.A.3.c]

3. AL-32 Bypass Damper Inspection

- a. The Permittee shall complete a visual, audio, and olfactory (AVO) and functional inspection of each AL-32 bypass damper once every month. The inspection shall document any evidence of leaks or improper orientation.

[A.A.C. R18-2-306.A.3.c]

- b. If any conditions of improper operation or sealing are observed during the monthly inspection, the Permittee shall complete the necessary repairs prior to continuing production operation of AL-32.

[A.A.C. R18-2-306.A.3.c]

4. Compliance Assurance Monitoring (CAM)

- a. Emission Units connected to Catalytic Oxidizer (I01)

(1) Indicators

- (a) The Permittee shall monitor the catalyst bed temperature.

[40 CFR 64.6(c)(1)(i)]

- (b) The Permittee shall monitor the differential pressure across the press room enclosure.

[40 CFR 64.6(c)(1)(i)]

(2) Monitoring Approach

[40 CFR 64.3]

- (a) At all times when any emission unit is connected to the catalytic oxidizer, the Permittee shall continuously monitor as practicable, and record the catalyst bed temperature with a temperature thermocouple installed at the inlet side of the catalyst bed. The thermocouple reflects temperature monitoring within the combustion chamber as opposed to inlet or exhaust air temperatures. The monitoring device shall be validated at a frequency in accordance with the manufacturer's specifications, or other written procedures that provide an adequate assurance that the device is calibrated accurately, or at

least annually, whichever is more frequent, and shall be accurate to within one of the following:

$\pm 0.75\%$ of the temperature being measured expressed in degrees Celsius; or

± 2.5 degrees Celsius.

- (b) The Permittee shall obtain a temperature reading once every 15 minutes and calculate a rolling 3 hour average.
- (c) At all times when any emission unit is connected to the catalytic oxidizer, the Permittee shall monitor and record the differential pressure across the press room enclosure to ensure the negative pressure is sufficient to meet the requirement of 100% capture.
- (d) The Permittee shall obtain a differential pressure reading at least once per shift. If more than one pressure reading is obtained during a shift the Permittee shall calculate a shift average.

(3) Excursion Determination

[40 CFR 64.6(c)92)]

- (a) At all times when any emission unit is connected to the catalytic oxidizer, any rolling 3 hour average below the catalyst bed temperature reported in the most recent performance test results approved by ADEQ shall constitute an excursion.
- (b) At all times when any emission unit is connected to the catalytic oxidizer, any shift average below the value required by EPA Method 204 shall constitute an excursion.

b. Emission Units connected to Regenerative Thermal Oxidizer (I02)

(1) Indicators

- (a) The Permittee shall monitor the combustion chamber temperature.

[40 CFR 64.6(c)(1)(i)]

- (b) The Permittee shall monitor the static pressure in the final trunk line inlet duct prior to the oxidizer blower.

[40 CFR 64.6(c)(1)(i)]

(2) Monitoring Approach

[40 CFR 64.3]

- (a) At all times when any emission unit is connected to the regenerative thermal oxidizer, the Permittee shall monitor and record the combustion chamber temperature with a temperature thermocouple installed in or immediately downstream of the combustion chamber. The monitoring device shall be validated at a frequency in accordance with the manufacturer's specifications, or other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:
 - $\pm 0.75\%$ of the temperature being measured expressed in degrees Celsius; or
 - ± 2.5 degrees Celsius.
 - (b) The Permittee shall obtain a temperature reading once every 15 minutes and calculate a rolling 3 hour average.
 - (c) At all times when any emission unit is connected to the regenerative thermal oxidizer, the Permittee shall continuously monitor as practicable, and record the static pressure in the final trunk line inlet duct prior to the oxidizer blower. The monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, or other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent.
 - (d) The Permittee shall obtain a static pressure reading once every 15 minutes and calculate a rolling 3 hour average.
- (3) Excursion Determination [40 CFR 64.6(c)(2)]
- (a) At all times when any emission unit is connected to the regenerative thermal oxidizer, any 3 hour average below the combustion temperature reported in the most recent performance test results approved by ADEQ shall constitute an excursion. Prior to obtaining ADEQ approved results of the first performance test, any 3 hour average temperature below 1500°F shall constitute an excursion.
 - (b) At all times when any emission unit is connected to the regenerative thermal oxidizer, any 3 hour average less negative than the static pressure reported in the most recent performance test results approved by ADEQ shall

constitute an excursion. Prior to obtaining ADEQ approved results of the first performance test, any 3 hour average less negative than the static pressure specified by final system design shall constitute an excursion.

D. Testing Requirements

[A.A.C. R18-2-312]

1. Catalytic Oxidizer (I01)

- a. The Permittee shall complete performance tests to determine the VOC destruction efficiency of the Catalytic Oxidizer in accordance with EPA Reference Method 25A.
- b. The performance testing shall be conducted per the following schedule:
 - (1) If Press 03 and the Catalytic Oxidizer are not permanently taken out of service by the end of August 2019, the Permittee shall complete a performance test on the Catalytic Oxidizer by the end of August 2019.
 - (2) If the Catalytic Oxidizer remains in service as a VOC control device after August 2019, the Permittee shall complete a subsequent performance test in the fourth calendar quarter of 2021.

2. Regenerative Thermal Oxidizer (I02)

- a. The Permittee shall obtain from the manufacturer, test results which validate the RTO is capable of a minimum VOC destruction efficiency of 97.5%. The Permittee shall obtain results of the validation test prior to placing the RTO in service as a control device for VOC emissions from production activities. The Permittee shall provide ADEQ a copy of the manufacturer's validation test of the RTO, including the results and details of the operating conditions under which the test was conducted. The Permittee shall submit the report within 15 days following the Permittee's receipt of the validation test results.

[A.A.C. R18-306.A.3.c]

- b. The Permittee shall complete performance tests to determine the VOC destruction efficiency of the RTO in accordance with EPA Reference Method 25A.

[A.A.C. R18-2-312]

- c. The performance testing shall be conducted per the following schedule:
 - (1) The initial test under this permit shall be completed no later than 30 days after Press 04 has been released to production.
 - (2) The second test under this permit shall be complete no later than 30 days after Press 05 has been released to production.

- (3) A subsequent test shall be completed in the fourth year of the permit term (CY 2022).

3. Permanent Enclosures

- a. The Permittee shall complete an EPA Method 204 test to verify the 100% capture efficiency of the following.
 - (1) The Press Room Permanent enclosure;
 - (2) Each material handling area PTE for Press 4 and 5; and
 - (3) Each material handling area PTE for Laminator/Coater AL-32.
- b. Concurrent with measurement of the pressure drop at each enclosure, the Permittee shall measure and record the static pressure in the final trunk line inlet duct of the corresponding thermal oxidizer control device as well as the operating status of each press and laminator ducted to the corresponding thermal oxidizer. The oxidizer duct static pressure and production equipment status shall be included in the test report.
- c. Testing Frequency
 - (1) The Permittee shall complete the testing specified in Conditions III.D.3.a and III.D.3.b for each enclosure concurrently with the destruction efficiency test required for each thermal oxidizer control device as specified in Conditions III.D.1 and III.D.2.
 - (2) The Permittee shall complete the testing specified in Conditions III.D.3.a and III.D.3.b for each enclosure at every occurrence of a connection or removal of a press or laminator is made to the inlet header of either thermal oxidizer.

IV. SOLVENT STILL AND STORAGE TANKS 4 AND 5

The Permittee shall route VOC emissions from the solvent still feed tank and solvent storage tanks ST-04 and ST-05 to RTO –I02.

[A.A.C. R18-2-306.A.2]

V. PARTICULATE MATTER AND OPACITY

- A. The Permittee shall only burn pipeline quality natural gas as fuel in the following equipment.

[A.A.C. R18-2-306.A.2]

1. The combustion burners of Catalytic Oxidizer (I01) and Regenerative Thermal Oxidizer (I02).
2. The dryers of Presses 01, 02, 03, 04 and 05.
3. The dryers of Laminator/Coater AL-32 and Extrusion Laminator EL-31.

4. Space Heater Units #1 through #9 and Roof Top Units #1 through #12.

B. Emissions Limitations and Standards

1. The Permittee shall not cause, allow or permit the emission of pollutants, caused by combustion of fuel, from the equipment identified in Conditions V.A.1, V.A.2 and V.A.3, into the atmosphere in excess of the amounts greater than the following.
[A.A.C. R18-2-730.A]

a. Particulate Matter

For particulate matter discharged into the atmosphere in any one hour from any unclassified process source in total quantities in excess of the amounts calculated by one of the following equations:

[A.A.C. R18-2-730.A.1]

- (1) For process sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

$$E = 4.10P^{0.67}$$

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight rate in tons-mass per hour.

[A.A.C. R18-2-730.A.1.a]

- (2) For process weight rate greater than 60,000 pounds per hour (30 tons per hour), the maximum allowable emissions shall be determined by the following equation:

$$E = 55.0P^{0.11} - 40$$

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight rate in tons-mass per hour.

[A.A.C. R18-2-730.A.1.b]

b. Sulfur dioxide – 600 parts per million.

[A.A.C. R18-2-730.A.2]

c. Nitrogen oxides expressed as NO₂ – 500 parts per million.

[A.A.C. R18-2-730.A.3]

2. For purposes of this Subpart, the total process weight from all similar units employing a similar type process shall be used in determining the maximum allowable emission of particulate matter.

[A.A.C. R18-2-730.B]

3. Actual values shall be calculated from the applicable equations and rounded off to two decimal places.

[A.A.C. R18-2-730.C]

C. Opacity

1. This subsection is applicable to the exhaust stacks from the following:
 - a. Extrusion Laminator EL-31;
 - b. Adhesive Laminator/Coater AL-32 (in AOS-1 operating mode);
 - c. Catalytic Oxidizer I01; and
 - d. Regenerative Thermal Oxidizer I02
2. The Permittee shall not cause, allow or permit to be emitted into the atmosphere any plume or effluent the opacity of which exceeds 20 percent.
3. In accordance with the procedures described in Condition I.A.2 of this Attachment, the Permittee shall monitor emissions from the sources identified in Condition V.C.1 quarterly (once every 3 months).

[R18-2-702.B]

[A.A.C. R18-2-306.A.3.c]

D. Monitoring, Recordkeeping, and Reporting

The Permittee shall keep records of fuel supplier certifications, letters from fuel suppliers, or other documentation such as results of laboratory tests containing information regarding the name of the fuel supplier, lower heating value and sulfur content of the fuel. These records provide the monitoring requirements of Conditions V.B.1.a, -b and -c. and shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c]

E. Permit Shield

Compliance with the conditions of this Subpart shall be deemed compliance with A.A.C. R18-2-730.A, -B and -C.

[A.A.C. R18-2-325]

VI. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any non-point source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations/Standards

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40%.

[A.A.C. R18-2-614]

- b. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

- (1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

- (2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

- (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway is repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

- (4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust;

[A.A.C. R18-2-605.B]

- (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust;

[A.A.C. R18-2-606]

- (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

- (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;

[A.A.C. R18-2-607.B]

- (8) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

- (9) The Permittee shall take reasonable precautions, such as the use of dust suppressants, before the cleaning of a site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

[A.A.C. R18-2-804.B]

2. Air Pollution Control Requirements

Haul Roads and Storage Piles

Water, or an equivalent control, shall be used to control visible emissions from haul roads and storage piles.

[A.A.C. R18-2-306.A.2 and -331.A.3.d]

[Material Permit Condition is indicated by underline and italics]

3. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Condition VI.B.1.b above were performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

b. Opacity Monitoring Requirements

On a quarterly basis, the Permittee shall monitor visible emissions from fugitive sources in accordance with Condition I.A.2.

[A.A.C. R18-2-306.A.3.c]

4. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, -614, and -804.B.

[A.A.C. R18-2-325]

VII. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/Standards

- (1) The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the

atmosphere through the use of good modern practices. Good modern practices include:

- (2) Wet blasting;
- (3) Effective enclosures with necessary dust collecting equipment; or
- (4) Any other method approved by the Director.

[A.A.C. R18-2-726]

b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

2. Monitoring and Recordkeeping Requirement

Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

- a. The date the project was conducted;
- b. The duration of the project; and
- c. Type of control measures employed.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with this Section shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

[A.A.C.R18-2-325]

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

- (1) While performing spray painting operations, the Permittee shall comply with the following requirements:
- (2) The Permittee shall not conduct or cause to be conducted any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.

[A.A.C.R18-2-727.A]

- (3) The Permittee or their designated contractor shall not either:
 - (a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
 - (b) Thin or dilute any architectural coating with a photochemically reactive solvent.
[A.A.C.R18-2-727.B]
 - (4) For the purposes of Condition VII.B.1.a(2), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Condition VII.B.1.a(3), or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:
 - (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.
 - (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.
 - (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.
[A.A.C. R18-2-727.C]
 - (5) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Condition VII.B.1.a(3), it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.
[A.A.C. R18-2-727.D]
- b. Monitoring and Recordkeeping Requirements
- (1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:
 - (a) The date the project was conducted;
 - (b) The duration of the project;
 - (c) Type of control measures employed;

(d) Safety Data Sheets (SDS) for all paints and solvents used in the project; and

(e) The amount of paint consumed during the project.

(2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VII.B.1.b(1).
[A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with this Section shall be deemed compliance with A.A.C.R18-2-727.

[A.A.C. R18-2-325]

2. Opacity

a. Emission Limitation/Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

b. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-702.B.3.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C. R18-2-1101.A.12]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-1101.A.12.

[A.A.C. R18-2-325]

ATTACHMENT “C”: EQUIPMENT LIST

Type of Equipment	Maximum Rated Capacity	Make/Model	Serial Number	Date of Manufacture	Equipment ID Number
8-color Flexo press/coater	57” web width, 1,500 fpm.	PCMC/7270	n.p.*	1991	Press-01
6-color Flexo press/coater	57” web width, 1,500 fpm	PCMC/7267	n.p.	1991	Press-02
8-color Flexo press/coater	57” web width, 1,500 fpm	PCMC/7208	n.p.	1994	Press-03
10-color Flexo press	67” print width, 2,000 fpm	Uteco/170	n.p.	2018	Press-04
10-color Flexo press, E-Beam Ready	67” print width, 2,000 fpm.	Uteco/170	n.p.	2018	Press-05
Outboard Coating Station, (Anti-Fog)	57” print width, 1,200 fpm.	n.p.	n.p.	2006	OP-03
Extruder/Laminator	56” web width, 1,200 fpm	Egan/n.p.	n.p.	1991	EL-31
Adhesive Laminator with Coating Deck	68” coat width, 1,470 fpm	Bobst/CL 1000	n.p.	2018	AL-32
Manual Parts Washer	23” × 72” × 45”	n.p./n.p.	n.p.	1991	PW-01
Automatic Parts Washer	120 gallons at 50% full	PRI/SW-5400	n.p.	1991	PW-02
Automatic Parts Washer & Still	4’ × 4 × 8’ Chamber	PRI/SWS-308	n.p.	2018	PW-03
Plate Washer	36” width	FlexoWash/PW-92	n.p.	2018	PW-04
Distillation Surge Tank	240 gallons	n.p./SU-01	n.p.	1991	n.p.
Distillation Feed Tank	320 gallons	PRI/DST-300	n.p.	2018	DFT-01
Photopolymer Plate Maker	120 gallons at 50% full	Esko/CDI 4260	n.p.	2006	PHO-02
Bulk Solvent Tank No. 1	10,000 gallon, (3 section)	n.p.	n.p.	1991	ST-01
Bulk Solvent Tank No. 2	10,000 gallon, (3 section)	n.p.	n.p.	1991	ST-02
Bulk Solvent Tank No. 3	10,000 gal, (3 section)	n.p.	n.p.	1991	ST-03
Waste Solvent Tank No. 4	7,000 gallon	n.p.	n.p.	1991	ST-04
Waste Solvent Tank No. 5	7,000 gallon	n.p.	n.p.	2018	ST-05

Catalytic Oxidizer	35,000 SCFM	Anguil/n.p.	n.p.	1991	I01
Regenerative Thermal Oxidizer	80,000 SFCM	Adwest/n.p.	n.p.	2008	I02

* none provided in application